



U.S. Department of Justice

Michael J. Sullivan
United States Attorney
District of Massachusetts

Main Reception: (617) 748-3100

John Joseph Moakley United States Courthouse
1 Courthouse Way
Suite 9200
Boston, Massachusetts 02210

November 10, 2004

By FAX

Barry P. Wilson, Esq.
240 Commercial street, Suite 5A
Boston, MA 02109

Re: United States v. Eric Lino

Dear Mr. Wilson:

Please add the following individuals to the governments witness list:

Major John Rogizinski
Barnstable County House of Correction
Barnstable, MA;

Officer Catrina Gonsalves
Bristol County Sheriff's Office;

Officer Eric L. Kraus
Falmouth Police Department; and

Thomas Cahill
Auto Pros
456 Bridgewater, MA 02324

Major Rogizinski will testify about the procedures used at the Barnstable County House of Correction to record telephone calls made by inmates. He also will testify about the tape containing the call between the defendant and Ms. Nicole Roderigues recorded on July 31, 2004.

Officer Gonsalves will testify about procedures used at the Bristol County House of Correction to record telephone calls made by inmates. She also will testify about the tape containing the call between the defendant and Randy Rose.

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Officer Kraus will testify about receiving the cocaine and scale from Mr. Gomes.

Thomas Cahill will testify about the April 12, 2003 purchase of the Cadillac Escalade. He recalls that the buyer's name was Eric, that he paid cash, and he recalls an uncle. During the unscheduled and brief conversation I had with Mr. Cahill, Mr. Cahill made a comment about not remembering.

Attached you will find the following documents:

- 1.) Two evidence label with copies of various other things included (2 pages);
- 2.) Four photographs of the Cadillac Escalade (exterior and interior) (1 page);
- 3.) Checkpoint form (1 page);
- 4.) Techlab form (1 page);
- 5.) Map depicting area of 110 Seabrook Dr. (1 page).

Please contact me if you believe there are any outstanding discovery issues. Please alert me at your first opportunity of your position with regard to the transcripts previously provided. I would like to assemble transcript binders for the Court, counsel, and the jury. I am prepared to call two or three chemists to testify regarding the cocaine seized in this case. If, however, you agree to stipulate as to the cocaine, I will cancel those witnesses.

Very truly yours,

David G. Tobin
Assistant U.S. Attorney